

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

|   |   |
|---|---|
| LIONRA TECHNOLOGIES LIMITED<br><br>v.<br><br>FORTINET, INC.           | Case No. 2:22-cv-00322-JRG-RSP<br><br>(Lead Case)<br><br><b>JURY TRIAL DEMANDED</b> |
| LIONRA TECHNOLOGIES LIMITED<br><br>v.<br><br>CISCO SYSTEMS, INC.      | Case No. 2:22-cv-00305-JRG-RSP<br><br>(Member Case)                                 |
| LIONRA TECHNOLOGIES LIMITED<br><br>v.<br><br>PALO ALTO NETWORKS, INC. | Case No. 2:22-cv-00334-JRG-RSP<br><br>(Member Case)                                 |

**PLAINTIFF LIONRA TECHNOLOGIES LTD.’S NOTICE OF NON-OPPOSITION TO  
DEFENDANT PALO ALTO NETWORKS, INC.’S MOTION FOR SUMMARY  
JUDGMENT OF NO PRE-SUIT INDIRECT INFRINGEMENT (DKT. 255)**

Defendant Palo Alto Networks, Inc. (“Palo Alto”) moves for summary judgment of No Pre-Suit Indirect Infringement (Dkt. 255). Plaintiff Lionra Technologies Ltd. will not be alleging pre-suit induced infringement at trial and therefore does not oppose Palo Alto’s motion.

Dated: March 5, 2024

Respectfully submitted,

By: /s/ Brett E. Cooper  
Brett E. Cooper (NY SBN 4011011)  
[bcooper@bc-lawgroup.com](mailto:bcooper@bc-lawgroup.com)  
Seth Hasenour (TX SBN 24059910)  
[shasenour@bc-lawgroup.com](mailto:shasenour@bc-lawgroup.com)  
Jonathan Yim (TX SBN 24066317)  
[jyim@bc-lawgroup.com](mailto:jyim@bc-lawgroup.com)

Drew B. Hollander (NY SBN 5378096)  
[dhollander@bc-lawgroup.com](mailto:dhollander@bc-lawgroup.com)  
**BC LAW GROUP, P.C.**  
200 Madison Avenue, 24th Floor  
New York, NY 10016  
Tel.: (212) 951-0100  
Fax: (646) 293-2201

Andrea L. Fair (TX Bar No. 24078488)  
Garrett Parish (TX Bar No. 24125824)  
**WARD, SMITH & HILL, PLLC**  
1507 Bill Owens Parkway  
Longview, TX 75604  
Telephone: (903) 757-6400  
[andrea@wsfirm.com](mailto:andrea@wsfirm.com)  
[gparish@wsfirm.com](mailto:gparish@wsfirm.com)

Glen E. Summers (CO Bar No. 30635)  
**BARTLIT BECK LLP**  
1801 Wewatta Street, Suite 1200  
Denver, CO 80202  
Telephone: (303) 592-3100  
[glen.summers@bartlitbeck.com](mailto:glen.summers@bartlitbeck.com)

Mark Levine (IL Bar No. 6276086)  
Luke Beasley (IL Bar No. 6334359)  
**BARTLIT BECK LLP**  
54 West Hubbard Street, Suite 300  
Chicago, IL 60654  
Telephone: (312) 494-4400  
[mark.levine@bartlitbeck.com](mailto:mark.levine@bartlitbeck.com)  
[luke.beasley@bartlitbeck.com](mailto:luke.beasley@bartlitbeck.com)

Amy J. Wildermuth (IL Bar No. 6256999)  
17811 Comstock Road  
Wayzata, MN 55391  
Telephone: (801) 913-4068  
[amy.wildermuth@gmail.com](mailto:amy.wildermuth@gmail.com)

*Attorneys for Plaintiff Lionra Technologies Limited*

**CERTIFICATE OF SERVICE**

Pursuant to Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that a copy of the foregoing document was served via electronic service on March 5, 2024.

/s/ Brett Cooper  
Brett Cooper